

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

APR - 1 2014

CLERK, U.S. DISTRICT COURT
By _____ Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

CHARLES WRIGHT (01)

No. 4:14-MJ-166

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about December 27, 2013, **Charles Wright**, knowingly distributed by any means, including by computer, any visual depiction using any means and facility of interstate and foreign commerce, knowing the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct. Specifically, **Wright** used the Internet to distribute of the following visual depiction of a minor engaged in sexually explicit conduct:

File Name	File Description
(sdpa) menininha de 3yr anos fasendo boque para o pai.mpg	This video depicts a prepubescent toddler being forced to perform oral sex on an adult male's erect penis.

In violation of 18 U.S.C. § 2252(a)(2).

1. Affiant, Christopher W. Thompson, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Dallas Division, being duly sworn, depose and state as follows:
2. I have been employed as a Special Agent of the FBI since April 2004, and I am currently assigned to the Dallas Division, which is located at One Justice Way, Dallas, Texas 75220.

As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I am currently assigned to a Child Exploitation Task Force, wherein my duties and responsibilities include investigating criminal violations relating to the sexual exploitation of children (SEOC). I have gained expertise in these types of investigations through training in seminars, classes, and my everyday work. In addition, I have received specialized training in the investigation and enforcement of federal child pornography laws in which computers are used as the means for transmitting, collecting and storing child pornography.

3. The information contained in this affidavit is based on my personal knowledge and experience, my own investigation, and information provided by other law enforcement officers and/or Agents. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that a violation of Distribution of Child Pornography, in violation of 18 U.S.C. § 2252(a)(2), has been committed at 3615 Gene Lane, Haltom City, Texas, by **Wright**.

4. On or about December 15, 2013 to December 27, 2013, Task Force Officer Jeffrey Rich conducted an investigation into the sharing of child pornography files on the ARES P2P file-sharing network. TFO Rich identified a computer with the IP address 71.11.228.144 as a potential candidate (source) for at least sixty four (64) files of investigative interest.

TFO Rich directed his investigation to this computer at IP address 71.11.228.144 because it had been recently detected as containing files of interest by investigators conducting keyword searches or hash value searches for files related to child abuse material, including child pornography, on the ARES network. TFO Rich downloaded nine files from a sharing client using the IP address 71.11.228.144, which was recorded along with the date, time, and hash value of each file transfer.

5. On or about December 27, 2013, Detective Rich connected to the Internet, a means and facility of interstate commerce, and downloaded the following file from IP address 71.11.228.144:

File Name	File Description
(sdpa) menininha de 3yr anos fasendo boque para o pai.mpg	This video depicts a prepubescent toddler being forced to perform oral sex on an adult male's erect penis.

6. Investigative research of the ARES network and IP address 71.11.228.144 showed that the IP address was first observed on the ARES network by law enforcement on December 14, 2012. Since then the user at IP address 71.11.228.144 has shared approximately 140 unique files of interest with keywords or names indicative of child pornography, hash values matching to identified child victims, or files containing images previously identified as meeting state or federal definitions of child pornography by other investigations.

7. TFO Rich downloaded nine files over several days; when reviewed, all nine of the files downloaded by TFO Rich depicted child pornography.

In particular, the video file listed in the complaint appears to depict a real minor engaged in sexually explicit conduct. These files were downloaded using a single-source program, meaning that all files were downloaded from IP address 71.11.228.144.

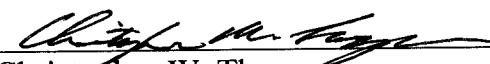
8. A search of the American Registry for Internet Numbers (ARIN) online database indicated that IP address 71.11.228.144 is registered to the Internet Service Provider (ISP) Charter Communications. On January 3, 2014, a Collin County search warrant was served to Charter Communications to obtain electronic communications and subscriber records for the subscriber of IP address 71.11.228.144 between December 15, 2013 at 8:16:44 a.m. and January 3, 2014 at 11:42:48 a.m. Central Time. Results from the search warrant sent to Charter Communications revealed that the IP address was assigned to an account registered to **Charles Wright** who resides at 3516 Gene Lane, Haltom City, Texas 76117, telephone number [redacted]-4464.

9. On March 31, 2014, I applied for and obtained a federal search warrant for the residence located at 3516 Gene Lane, Haltom City, Texas, in the Fort Worth Division of the Northern District of Texas.

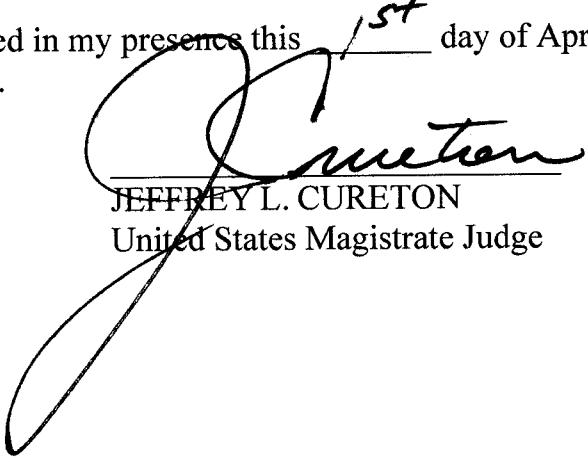
10. On April 1, 2014, I, along with other agents and officers with the FBI Dallas Child Exploitation Task Force, executed the search warrant at 3516 Gene Lane, Haltom City, Texas. **Wright** was present and agreed to speak with us after I read him his *Miranda* warnings. **Wright** confessed to using Ares to download, to view, and to share child pornography. He used the search term “pthc” (meaning pre-teen hard core) and “ptsc” (meaning pre-teen soft core) to locate the files via Ares and would download the files and view them.

The files he downloaded were large in size, almost all videos, and numbered greater than 100. I showed **Wright** screen shots of the videos downloaded by TFO Rich, including the video file listed in this complaint, and **Wright** identified four of the videos, including the file listed in the complaint, as those that he had downloaded; **Wright** also said those four videos currently resided on his computer.

11. An on-site forensic search of one of **Wright's** computers was conducted. This search detected the presence of child pornography. Based upon the foregoing facts and circumstances, I believe probable cause exists to find that **Charles Wright** has knowingly committed a violation of 18 U.S.C. § 2252(a)(2), that is, distribution of any visual depiction of a minor engaged in sexually explicit conduct.


Christopher W. Thompson
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence this 1st day of April 2014, at 1:50 p.m. in Fort Worth, Texas.


JEFFREY L. CURETON
United States Magistrate Judge